

SUPPLIER CODE OF CONDUCT

Kwizda Group (hereinafter: Kwizda)

The Principles of the Kwizda Supplier Code of Conduct (“SCoC”) are based on relevant Conventions of the International Labour Organization (“ILO”), the Universal Declaration of Human Rights and internationally accepted occupational health and safety as well as environmental standards. Furthermore, the values enshrined in the United Nations (“UN”) Charter, respect for fundamental human rights, social justice and human dignity, and respect for the equal rights of men and women, serve as overarching values to which suppliers of goods and services to Kwizda are expected to adhere.

This SCoC has been developed with recognition of the importance of the ten principles of the UN Global Compact, and is viewed as an important means of integrating the Compact’s principles into the operations of Kwizda. The SCoC addresses the issues included in the Compact in the areas of human rights, labour, environment and anti-corruption and interpretation of the SCoC should be undertaken in a manner consistent with the Global Compact. Suppliers interested in supporting the Global Compact and obtaining more information on the ten principles, can visit the Global Compact website at www.unglobalcompact.org.

The International Labour Standards (i.e., Conventions and Recommendations) as established by the tripartite UN specialized agency, the ILO, have served as the foundation on which much of this SCoC is based. It is Kwizda’s expectation that any supplier providing products or services to Kwizda will, in addition to the values of the UN Charter, adhere to the principles concerning International Labour Standards summarized below¹.

The provisions of this SCoC set forth Kwizda’s expectations for all suppliers with whom it does business. Kwizda expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities, and subcontractors. Kwizda expects suppliers to ensure that this SCoC is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all.

The provisions as set forth in this SCoC provide the minimum standards expected of suppliers to Kwizda. Kwizda expects suppliers to strive to exceed both international and industry best practices. Kwizda also expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this SCoC. Kwizda recognizes that reaching some of the standards established in this SCoC is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

It is the expectation of Kwizda that suppliers, at a minimum, have established clear goals toward meeting the standards set forth in this SCoC. Kwizda expects that its suppliers will establish and maintain appropriate management systems related to the content of this SCoC, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this SCoC. Kwizda may monitor that milestones have been set and management systems have been put in place to ensure that the principles set out in this SCoC have been met and failure to do so may impact the future ability of a supplier to do business with Kwizda.

¹ The full texts of the ILO Conventions and Recommendations can be accessed at: www.ilo.org/global/standards/lang--en/index.htm

To review the progress of suppliers and subcontractors in implementing the SCoC, Kwizda may take various supporting initiatives, including requesting suppliers to commit to the Global Compact, to self-certify that they comply with the SCoC and, in some cases, to conduct on site evaluations and inspections of supplier facilities and those of their subcontractors.

I. LABOUR

1. **Freedom of Association and Collective Bargaining:** Kwizda expects its suppliers to recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively². Where the right to freedom of association and collective bargaining is restricted under law, the employer shall consider the development of parallel means for independent and free association and bargaining.
2. **Forced or Compulsory Labour:** Kwizda expects its suppliers to prohibit forced or compulsory labour in all its forms, whether in the form of prison labour, indentured labour, bonded labour, or otherwise³. No employee can be compelled to work through force, the threat of force, or intimidation of any form.
3. **Child Labour:** Kwizda expects its suppliers not to employ: (a) children below 14 years of age or the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is the highest; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons⁴.
4. **Discrimination:** Kwizda expects its suppliers to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination on grounds of gender, race, colour, nationality, sex, sexual orientation, sexual identity, religion, age, political opinion, disability, national extraction or social or ethnic origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place⁵. Foreign or domestic migrant labour shall be treated on an equal basis with local employees.
5. **Wages, Working Hours and Other Conditions of Work:** Kwizda expects its suppliers to fully and legally compensate their employees for all hours worked. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement, and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less

² These principles are set out in the ILO fundamental Conventions, No. 87, Freedom of Association and Protection of the Right to Organise, 1948 and No. 98, Right to Organise and Collective Bargaining, 1949.

³ This principle is set out in the ILO fundamental conventions, No. 29, Forced Labour, 1930 and No. 105, Abolition of Forced Labour, 1957.

⁴ These principles are set out in the ILO fundamental Conventions, No. 138, Minimum Age, 1973 and No. 182, Worst Forms of Child Labour, 1999 and in the UN Convention on the Rights of the Child.

⁵ These principles are set out in the ILO fundamental Conventions, No. 100, Equal Remuneration, 1951 and No. 111, Discrimination (Employment and Occupation), 1958.

favourable than the best conditions prevailing locally (i.e., as contained in: (i) collective agreements covering a substantial proportion of employers and workers; (ii) arbitration awards; or (iii) applicable laws or regulations), for work of the same character performed in the trade or industry concerned in the area where work is carried out⁶.

6. **Regular Employment:** Kwizda expects its suppliers to employ their employees on the basis of a recognised employment relationship established through national law and practice. Obligations of employers shall not be avoided through the excessive use of temporary contracts, subcontracting or apprenticeship schemes.
7. **Health and Safety:** Kwizda expects its suppliers to provide a safe and hygienic working environment, and occupational health and safety practices which prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities shall be promoted. This includes safe buildings, fire protection, electrical safety, safe use of hazardous substances and correct use of personal protective equipment. Lighting, heating and ventilation systems should be adequate. Employees should have access to adequate sanitary facilities and potable water at all times. The workplace shall have safety and health policies and procedures that are clearly communicated to all employees⁷. All standards shall apply to employee residential facilities, where provided by employers.

II. HUMAN RIGHTS:

1. **Human Rights:** Kwizda expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses⁸.
2. **Harassment, Harsh or Inhumane Treatment:** Kwizda expects its suppliers to create and maintain an environment that treats all employees with dignity and respect and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.
3. **Mines:** Kwizda expects its suppliers not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

III. ENVIRONMENT:

1. **Environmental:** Kwizda expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental

⁶ These principles are set out in ILO Conventions No. 95, Protection of Wages, 1949 and No. 94, Labour Clauses (Public Contracts), 1949 and in a number of Conventions addressing working time (see www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/working-time/lang-en/index.htm)

⁷ See the ILO Conventions, Recommendations and Codes of Practice identified at: www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang-en/index.htm

⁸ These principles are derived from Universal Declaration of Human Rights (UDHR) and are set out in the United Nations Global Compact (see www.unglobalcompact.org/Issues/human_rights/index.html)

matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

2. **Chemical and Hazardous Materials:** Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.
3. **Wastewater and Solid Waste:** Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.
4. **Air Emissions:** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.
5. **Minimize Waste, Maximize Recycling:** Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

IV. ETHICAL CONDUCT:

1. **Legal Compliance:** Kwizda expects its suppliers to operate in full compliance with national and local laws, rules and regulations relevant to their business.
2. **Subcontractors:** Kwizda expects its suppliers to have full knowledge of all subcontractors in their supply chain. All subcontractors must comply with this SCoC.
3. **Corruption:** Kwizda expects its suppliers to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.
4. **Conflict of Interest:** Kwizda suppliers are expected to disclose to Kwizda any situation that may appear as a conflict of interest, and disclose to Kwizda if any Kwizda official or professional under contract with Kwizda may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.
5. **Gifts and Hospitality:** Kwizda maintains a strict policy regarding gifts and hospitality. Kwizda expects its suppliers not to offer any benefits such as free goods or services, employment, sales opportunities, invitations to sporting or cultural events, offers of holidays or other recreational trips, as well as dinner, lunches or business meals to Kwizda staff members in order to facilitate the suppliers' business with Kwizda.
6. **Conflict Minerals:** Kwizda suppliers are expected to ensure that they do not supply products that contain conflict minerals which directly or indirectly finance or benefit armed groups and cause human rights abuses as outlined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Countries ("OECD

DDG”⁹). Kwizda expect its suppliers to fulfil their due diligence on mineral supply chains according to the recommendations outlined in the OECD DDG.

7. **Post-employment restrictions:** Post-employment restrictions may apply to Kwizda staff in service and former Kwizda staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. Kwizda suppliers are expected to refrain from offering employment to any such person for a period of one year following separation from service.
8. **Protection of data:** Kwizda suppliers must ensure that confidential and proprietary information is properly used and secured. This means in particular information concerning the companies, the employees, their personal data and the information to be kept secret, whether protected as industrial rights or not. In addition, Kwizda expects its suppliers to comply with a level of data protection that is at least comparable to that set out in the General Data Protection Regulation (GDPR)¹⁰.
9. **Animal protection:** Animals shall be treated with respect. Pain and stress to which animals are subjected shall be minimised. Animal experiments should be avoided as far as possible. Instead, methods should be sought that make animal experiments obsolete. If scientific requirements are sufficient or accepted by the authorities, alternatives to animal testing should be preferred.

Kwizda reserves the right to make reasonable changes to these principles. In the event of such a change, Kwizda expects such changes to be accepted; the supplier hereby declares its willingness to reject them only for good cause.

Our business relationship is based on honesty and mutual respect. A supplier may demonstrate its commitment to these principles through its own code of conduct or appropriate corporate policies incorporating these standards. However, Kwizda may insist on proof of conformity with its own principles and, in the event of concerns, request their remedy. To this end, suppliers shall cooperate with Kwizda or any third party commissioned by it, in particular:

- at the request of Kwizda, complete a questionnaire regarding conformity with these principles (self-assessment);
- at the request of Kwizda, provide evidence to document compliance with these principles (certificates).

Furthermore, to said end,

- Kwizda is entitled, directly or indirectly, to carry out with reasonable notice on-site inspections to verify compliance with the sustainability principles on site (on-site audit).
- Kwizda may obtain legally information from a third party about the supplier's compliance and performance in relation to the requirements of the principles (third party evaluation).

⁹ <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>

¹⁰ The full text of the GDPR can be accessed at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&qid=1695367439937>

Non-adherence to these principles will be a factor in considering whether a supplier is deemed eligible to do business with Kwizda and/or whether Kwizda will continue the business relationship.